

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

In re:	)	
CHARLES DILLON and	)	Case No. 10-26265-gmh
SYDNEY DILLON,	)	Chapter 13
	)	
Debtors.	)	

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**MOTION TO APPROVE DISCOUNT PAYOFF AGREEMENT**

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Charles and Sydney Dillon, by their attorneys, DeLadurantey Law Office, LLC, by Nathan E. DeLadurantey, respectfully request that this Court enter an order approving a "Discount Payoff Agreement" between the debtors and Ocwen Loan Servicing, LLC ("Ocwen"). A summary of the terms of the agreement are as follows:

1. The debtors shall remit \$2,000.00 to Ocwen as a payoff of Ocwen's junior lien attached to the debtors homestead property located at 5751 N Teutonia Ave, Milwaukee, WI 53209.
2. Upon receipt of the \$2,000.00 payoff amount and compliance with the instructions found in the agreement, Ocwen shall waive the remaining balance due to satisfy the junior lien and release the debtors from further obligation.

The debtors wish to enter into the agreement according to the terms listed above, and Ocwen has stated it will not honor the agreement without an order from the Bankruptcy Court approving the agreement. Thus, the debtors request that the Court enter an order approving the agreement.

Dated: March 12, 2015.

DeLadurantey Law Office, LLC  
Attorneys for Debtors

/s/

By: Nathan E. DeLadurantey  
State Bar No. 1063937

Drafted by:  
Daniel T. Beasley  
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Milwaukee, WI 53233  
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	)	Case No. 10-26265-gmh
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**NOTICE OF MOTION TO APPROVE DISCOUNT PAYOFF AGREEMENT**

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PLEASE TAKE NOTICE that Attorney Nathan E. DeLadurantey, Debtor's counsel of record, has filed a "Motion to Approve Discount Payoff Agreement". If you have an objection/response to the motion, you are required to file the objection/response within fourteen (14) days of the date of this notice. Your objection/response should be filed with:

Clerk of United States Bankruptcy Court  
Room 126, U.S. Courthouse  
517 East Wisconsin Avenue  
Milwaukee, WI 53202

You must also mail a copy of your objection/response to:

DeLadurantey Law Office, LLC  
735 W. Wisconsin Avenue, Suite 720  
Milwaukee, WI 53233

If you do not file a timely objection/response, the Court may sign the order approving the motion.

PLEASE TAKE FURTHER NOTICE that a hearing may be scheduled on any timely objection/response. Notice of the hearing will be provided to the objecting party and any other interested parties.

Dated: March 12, 2015.

DeLadurantey Law Office, LLC  
Attorneys for Debtor

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/s/ \_\_\_\_\_  
By: Nathan E. DeLadurantey  
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EASTERN DISTRICT OF WISCONSIN

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CHARLES R. DILLON,	)	Case No. 10-26265
SYDNEY DILLON,	)	Chapter 13
	)	
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**CERTIFICATE OF SERVICE**

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Daniel Beasley states under oath that he is over the age of 18 and an attorney at DeLadurantey Law Office, LLC, attorneys for the debtors, and that on March 12, 2015, he delivered true and correct copies of the attached “Notice of Motion to Approve Discount Payoff Agreement,” and “Motion to Approve Discount Payoff Agreement” and “Certificate of Service” via the CM/ECF system or first-class mail to the following parties:

Clerk, U.S. Bankruptcy Court  
Eastern District of Wisconsin  
*via CM/ECF*

Trustee Mary B. Grossman  
*via CM/ECF*

Office of the United States Trustee  
*via CM/ECF*

I certify under penalty of perjury that the foregoing is true and correct.

Executed on March 12, 2015.

Signed: /s/ Daniel Beasley  
Daniel Beasley

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